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BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Into )  
Implementation of Federal Communications ) R. 04-12-001  
Commission Report and Order 04-87, As It )  
Affects The Universal Lifeline Telephone Service )  
Program. )

COMMENTS OF SUREWEST TELEPHONE (U 1015 C)

ON

ASSIGNED COMMISSIONER'S RULING TEMPORARILY SUSPENDING PORTIONS  
OF GENERAL ORDER 153 RELATING TO THE ANNUAL ULTS/CALIFORNIA  
LIFELINE VERIFICATION PROCESS

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November 6, 2006

1 In accordance with Ordering Paragraph 5 of Commissioner Grueneich's November 1, 2006  
2 Assigned Commissioner's Ruling ("ACR"), SureWest Telephone (U 1015 C) offers these brief  
3 comments on the ACR's suspension of the current income verification process for the California  
4 Lifeline program ("Lifeline"). Based on concerns regarding the low customer response rate to  
5 Lifeline verification notices, and based on the numerous complaints that the Commission's  
6 Consumer Affairs Branch ("CAB") has been receiving regarding the verification process, the ACR  
7 suspends the current annual verification procedure for six months, and initiates a workshop to  
8 "discuss solutions to the current problem with the verification form response rate." (ACR, at p. 6).  
9 That workshop is currently scheduled for November 13-14, 2006.

11 SureWest supports the Commission's efforts to address the problems that have arisen in  
12 implementing the new Lifeline verification mechanism. However, the problems with the new  
13 Lifeline program are not limited to the format of the verification notice envelope, and the  
14 inflexibility of the verification timeframe. Since Solix assumed responsibility for the certification  
15 and verification process, SureWest has experienced a number of database, data transfer, and  
16 customer classification/identification issues. These issues relate both to the verification process  
17 and to the certification process. These difficulties have caused SureWest to incur significant  
18 additional Lifeline-related administrative expenses. The new system has also generated confusion  
19 and uncertainty for many of SureWest's Lifeline customers.

22 To ensure that the full range of implementation issues raised by the new Lifeline program  
23 are addressed, the upcoming workshop should not be limited to the narrow verification-related  
24 concerns identified in the ACR. The ACR should direct staff to conduct a broad examination of  
25 the implementation problems that carriers and customers have experienced under the new  
26 procedures. For the benefit of customers, carriers, and the ongoing viability and funding of the  
27  
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1 Lifeline program, it is important that the Commission take this opportunity to address all of the  
2 relevant problems, and fashion appropriate solutions.

3 SureWest appreciates the Commission's recognition that the program is not operating as  
4 smoothly as it could, and the Commission's swift action to address the situation. SureWest looks  
5 forward to participating in the November 13<sup>th</sup> and 14<sup>th</sup> workshops, and will be in communication  
6 with staff about additional issues for inclusion in the workshop agenda.  
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8 Respectfully submitted,

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